

2.0 - History of the Pretreatment Program

In 1973, the EPA awarded Manchester a 20 million-dollar construction grant to build a new secondary wastewater treatment facility. The City passed a Sewer Use Ordinance in 1973 to provide a legal basis for the industrial pretreatment program. In 1975, the Department of Highways Environmental Protection Division established an industrial monitoring program. Two individuals were assigned to the job of developing and administering the source control program. During the next few years the industrial monitoring personnel performed:

- An industrial survey to identify firms required to comply with pretreatment regulations
- Developed list of commercial and industrial establishments
- Conducted field surveys to determine origin of wastes. The survey determined that 45 establishments generated significant process waters
- Sampled and analyzed the effluent from the identified 45 establishments
- Required 20 of the 45 establishments to install and maintain monitoring facilities
- Required 15 of the 45 establishments to install pretreatment for prohibited discharges
- Notified nine electroplating firms of the requirements of the Manchester pretreatment program and met individually with each firm
- Obtained early compliance from some of the targeted firms

The treatment plant construction was completed in 1976 with flow coming to the treatment facility in May of that year. Suggested changes were made to the pretreatment program with submission to the EPA on January 7, 1980.

2.1 - 1980 to Present

The City of Manchester had the original Industrial Pretreatment Program approved in 1980. There have been a few program additions and modifications since the approval of the original program. The program revisions since original approval are as follows:

- **9/6/89** (#89-061-MO) - Revisions to the Discharge Permit Application Form
- **11/13/89** (#89-251-MO) - Request to change penalty provisions from \$100 a day to \$1,000 a day
- **10/3/90** (#90-117-MO) - Changes to IU Discharge Permits to include:
 - a) Modifications to cover sheet to cite legal authority, duty to comply, effective date and notification that permit condition violations constitute Ordinance violations
 - b) Acknowledgement Sheet adding signature of an authorized representative to clarify signatory requirements
 - c) Accidental Discharge Reporting requirements added to page 10 of the permit to require notification of slugs or other discharges potentially harmful to the WWTP

- d) Monitoring Records and Requirements are added with a new page 11 and 12.
- e) Change definition of Authorized Representative to comply with §403.12(1)
- **5/13/91** (#91-047-MO) - Revision of Inspection Report Form to include:
 - a) Info on hazardous waste type and disposal methods
 - b) Lines for monitoring equipment problems, self monitoring sampling & analysis and slug control plan information
 - c) Checklist for routine inspection items
 - d) Form reformatting to improve readability
- **5/16/91** (#91-049-MO) - Changes of Industrial Classification Scheme to include:
 - a) User Classification scheme
 - b) Wastewater Discharge Permit Application
 - c) Discharge Permits for Class I & II IUs
 - d) General Wastewater Discharge Permit
- **10/23/91** (#91-091-MO) - Permits Modifications to include:
 - a) Modifications to page 6 to include effluent limitations and violations
 - b) Modifications to page 1 of Class III Permits to include a Permit Number
- **3/4/93** (#93-030-MO) - Enforcement Response Plan (ERP) and Chain-of-Custody
 - a) Submission of final and full ERP after comments from draft
 - b) Chain-of-Custody Form revisions

The initial program does not include the ongoing changes and updates in the Sewer Use Ordinance, and the revisions to the originally submitted forms.

These changes along with all new and updated regulations have been added to the Sewer Use Ordinance. The changed regulations and local limits have been proposed to the Ordinance Committee, reviewed, discussed, recommended to the Council of Mayor and Alderman, allowed public comments, and enrolled into the Sewer Use Ordinance. The Ordinance has carried the weight of enforcement responsibility as the original pretreatment program moved to obsolescence.

It has been two decades since the original program approval. Manchester is taking the initiative to completely rewrite and update the Approved Pretreatment Program. The intent and conditions of the original program have not only been included, but they have been enhanced, expanded upon, and made current to account for ongoing regulatory requirements.